

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
<b>Petitioner,</b>	)	
	)	
<b>V.</b>	)	<b>CIVIL NO. SA-24-CV-875</b>
	)	
<b>RADICAL ARMS RF-15 RIFLE,</b>	)	
<b>5.56 CALIBER, SN: 23-094079;</b>	)	
<b>GFORCE ARMS MKX3 SHOTGUN,</b>	)	
<b>12 GAUGE, SN: 21-103764;</b>	)	
<b>FREEDOM ORDINANCE FX-9 PISTOL,</b>	)	
<b>9MM CALIBER, SN: 064460;</b>	)	
<b>CANIK METE SFT PISTOL,</b>	)	
<b>9MM CALIBER, SN: 21CC09233,</b>	)	
	)	
<b>Respondents.</b>	)	

**VERIFIED COMPLAINT FOR FORFEITURE**

Comes now Petitioner United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and respectfully states as follows:

**I.  
NATURE OF THIS ACTION**

This action is brought by the United States of America seeking forfeiture to the United States of the following property:

- 1. Radical Arms RF-15 rifle, 5.56 caliber, SN: 23-094079;**
- 2. GForce Arms MKX3 shotgun, 12 Gauge, SN: 21-103764;**
- 3. Freedom Ordinance FX-9 pistol, 9mm caliber, SN: 064460; and**
- 4. Canik Mete SFT pistol, 9mm caliber, SN: 21CC09233,**

hereinafter the “Respondent Firearms”.

## II. **JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, this Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Firearms under Title 28 U.S.C. §§ 1355(b) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to Title 28 U.S.C. §§ 1355(b)(1)(B) and 1395(b) because the Respondent Firearms are found in this district.

## III. **STATUTORY BASIS FOR FORFEITURE**

This is a civil forfeiture action *in rem* brought against the Respondent Firearms for the violation of Title 18 U.S.C. § 922(a)(6) subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. § 924(d)(1), which states:

### **Title 18 U.S.C. § 924. Penalties**

**(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (a) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . . .

## IV. **FACTS IN SUPPORT OF VIOLATION**

See Appendix A for facts under seal.

## V. **PRAYER**

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Firearms, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,<sup>1</sup> and in

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<sup>1</sup>Appendix A, which is being filed along with this complaint, will be sent to those known to the

accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., that the Respondent Firearms be forfeited to the United States of America, that the Respondent Firearms be disposed of in accordance with the law and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

JAIME ESPARZA  
United States Attorney

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Attorneys for the United States of America

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United States to have an interest in the Respondent Firearms.

**VERIFICATION**

Special Agent Heather Plummer, declares and says that:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, assigned to the San Antonio Field Office, and I am the investigator responsible for the accuracy of the information provided in this litigation.

2. I have read the above Verified Complaint for Forfeiture and know the contents thereof; the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and the allegations contained in the Verified Complaint for Forfeiture are true based on information and belief.

Pursuant to Title 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

**HEATHER  
PLUMMER**

Digitally signed by HEATHER  
PLUMMER  
Date: 2024.08.08 11:26:54  
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Heather Plummer, Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
San Antonio Field Office